

March 9, 2012

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support*, FCC Public Notice in WC Dockets 10-90 and 05-337, DA 12-137 (Wireline Competition Bur., rel. Feb. 6, 2011)

Dear Ms. Dortch:

Pursuant to the *CAF I Wire Center Public Notice* cited above, Alaska Communications Systems Group, Inc., on behalf of its four incumbent local exchange carrier subsidiaries ("ACS"), hereby files data for the calculation of the incremental support amounts that will be made available under the Connect America Fund ("CAF") Phase I mechanism.

In the *CAF I Wire Center Public Notice*, parties are invited to submit data, on a wire center basis, for each of the input variables used in the Commission's high-cost model.<sup>1</sup> In this filing, ACS provides data describing its wire centers, which ACS believes will be useful to the Bureau in determining which wire centers are eligible for CAF Phase I incremental support, and in calculating the distribution of support among price cap carriers under the Commission's high-cost proxy model. This supplements data that ACS filed in these proceedings on February 29, 2012.

Three categories of information requested by the Wireline Competition Bureau are provided in the attached spreadsheet:

---

<sup>1</sup> *CAF I Wire Center Public Notice*, para. 4. Comments are due by March 19, 2012. See 77 Fed. Reg. 9653 (Feb. 17, 2012). ACS files the attached data at this time to assist the Bureau in meeting its March 31 deadline for announcement of CAF Phase I incremental support amounts for each price cap carrier.

Marlene H. Dortch

March 9, 2012

Page 2

- First, ACS provides the distance in feet between each ACS wire center and the nearest adjacent wire center, whether or not owned by ACS. This data is derived from the geographic coordinates (Latitude and Longitude) available from the National Exchange Carrier Association (NECA).
- Second, ACS provides the square mileage for the area served by each ACS wire center.
- Third, ACS provides the length (in feet) of total road miles within the area served by each ACS wire center. This data is principally derived from the Census Bureau TIGER data, though that data counts only certain types of road miles.

Please direct any questions concerning these matters to me.

Very truly yours,

Karen Brinkmann

*Counsel for Alaska Communications Systems  
Group, Inc.*

Attachment

cc: Steven Rosenberg, Chief Data Officer, Wireline Competition Bureau  
Katie King, Special Counsel, Telecommunications Access Policy Division  
("TAPD"), Wireline Competition Bureau  
Joseph Cavender, TAPD, Wireline Competition Bureau  
Charles Tyler, TAPD, Wireline Competition Bureau